

DOCA COMPANY, as successor to)	No. 2:04-cv-01951
Caldon Company Limited Partnership,)	
)	
Plaintiff/Counterclaim Defendant,)	Hon. Maurice B. Cohill
)	
vs.)	Hon. Lisa Pupo Lenihan
)	
WESTINGHOUSE ELECTRIC COMPANY)	JURY TRIAL DEMANDED
LLC, and ADVANCED MEASUREMENT &)	
ANALYSIS GROUP, INC.,)	
)	
Defendants/Counterclaim Plaintiffs.)	

Plaintiff requests that it be permitted to substitute the attached Amended Complaint for the Amended Complaint attached to its Motion for Leave to File Amended Complaint, and, in support thereof, hereby states as follows:

1. On July 30, 2010, the Plaintiff filed Plaintiff's Motion for Leave to File Amended Complaint (the "Motion"), and attached thereto a proposed Amended Complaint.
2. That Motion is still pending and therefore the proposed Amended Complaint attached to the Motion has not been filed.
3. The Plaintiff would like to make a number of corrections to its proposed Amended Complaint as follows:
 - a. Change the caption of the Amended Complaint to comply with the Court's Order Substituting Real Party In Interest dated November 15, 2010.
 - b. In paragraph 63, change "March 22, 2000" to "March 20, 2000."

- c. In paragraph 71 change "March 26, 2000" to "March 20, 2000."
- d. In paragraph 92, change "December 23, 2002" to "December 18, 2002."
- e. In paragraphs 75, 76, 80, 85, 142 and 155, change "Kill Caldon Memorandum" to "Kill Caldon White Paper."
- f. In paragraph 142 change the definition of the Relevant Market from "high accuracy UFM nuclear power generating market" to "the MUR Uprate Market."
- g. In paragraph 153, after the words "unlawful attempt to monopolize," add ", and a combination and/or conspiracy to monopolize,."
- h. In paragraph 154 change "2003," which appears at the end of the last sentence, to "2002."

4. Attached hereto is the substituted proposed Amended Complaint, which incorporates the foregoing changes and which the Plaintiff would intend to file in the event that the Court grants the Motion.

5. The attached substituted proposed Amended Complaint is identical in all respects to the proposed Amended Complaint attached to the Motion except for the changes set forth above.

6. In order to avoid confusion the proposed Amended Complaint attached hereto is called "Corrected Amended Complaint."

WHEREFORE, the Plaintiff respectfully requests leave to substitute the Corrected Amended Complaint attached hereto for the proposed Amended Complaint attached to Plaintiff's Motion for Leave to File Amended Complaint.

Dated: June 23, 2011

Respectfully submitted,

PICADIO SNEATH MILLER & NORTON, P.C.

By: /s/ Anthony P. Picadio

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing PLAINTIFF'S MOTION TO SUBSTITUTE PROPOSED AMENDED COMPLAINT, was served upon all counsel of record this 23rd day of June, 2011, via email and via First-Class United States Mail, postage prepaid, in sealed envelopes, addressed as follows:

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